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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER  
IN SUPPORT OF PLAINTIFF WAYMO  
LLC'S ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
EXHIBIT 1 TO WAYMO'S OPPOSITION  
TO UBER'S SECOND MOTION TO  
COMPEL**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Portions of Exhibit 1 to Waymo’s Opposition to Uber’s Second Motion to Compel (the  
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1 to Waymo’s opposition to Uber’s second motion to compel (“Exhibit 1”)	Green highlighted portions	Waymo

12  
13 3. Exhibit 1 contains the identities of suppliers/vendors with whom Waymo has engaged  
14 or considered engaging in furtherance of its highly confidential LiDAR development. Waymo seeks  
15 to seal only the identities of those vendors. The public disclosure of this information would give  
16 Waymo’s competitors access to the identities of Waymo’s development partners. If such information  
17 were made public, I understand that Waymo’s competitive standing would be significantly harmed  
18 and that the disclosure itself may violate Waymo’s NDAs with those partners. Waymo’s request to  
19 seal is narrowly tailored to only the identities of the vendors.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing is  
21 true and correct, and that this declaration was executed in San Francisco, California, on July 14, 2017.

22 By /s/ Lindsay Cooper

23 Lindsay Cooper  
24 Attorneys for WAYMO LLC  
25  
26  
27  
28

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven  
Charles K. Verhoeven